

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CAROLYN GREENE, Individually and On Behalf of)
All Others Similarly Situated,)
)
Plaintiff,) Civil Docket for Case No.:
) 1:03-CV-12628-NG
)
v.)
)
BIOPURE CORPORATION, THOMAS A. MOORE,) Hon. Nancy Gertner
CARL W. RAUSCH and RONALD F. RICHARDS,)
)
Defendants.)

X

(Additional captions on following pages)

DECLARATION OF CHRISTOPHER KELLER IN SUPPORT OF MOTION
OF THE BHASKAR GROUP FOR CONSOLIDATION OF RELATED ACTIONS,
APPOINTMENT AS LEAD PLAINTIFF AND APPROVAL OF PROPOSED
LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

JOHN G. ESPOSITO, On Behalf of Himself and
All Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

MICHAEL E. CRIDEN, Individually and On Behalf of All
Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE and
CARL W. RAUSCH,

Defendants.

JOSEPH L. KING, On Behalf of Himself and All Others
Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

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Civil Docket for Case No.:
1:04-CV-10013-NG

Hon. Nancy Gertner

Civil Docket for Case No.:
1:04-CV-10046-NG

Hon. Nancy Gertner

Civil Docket for Case No.:
1:04-CV-10038-NG

Hon. Nancy Gertner

ISRAEL SHURKIN and SIARON SHURKIN,
Individually and On Behalf of All Others Similarly
Situating,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE and
CARL W. RAUSCH,

Defendants.

JAMES J. NIZZO, VIRGINIA C. NIZZO and CARLO
CILBERTI, On Behalf of Themselves and All Others
Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

BARRY BROOKS,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

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Civil Docket for Case No.:
1:04-CV-10055-NG

Hon. Nancy Gertner

Civil Docket for Case No.:
1:04-CV-10065-NG

Hon. Nancy Gertner

Civil Docket for Case No.:
1:04-CV-10077-NG

Hon. Nancy Gertner

x

ANASTASIOS PERLEGIS, Individually and On Behalf of)
 All Others Similarly Situated,)

Plaintiff,)

v.)

BIOPURE CORPORATION, THOMAS A. MOORE,)
 CARL W. RAUSCH and RONALD F. RICHARDS,)

Defendants.)

Civil Docket for Case No.:
 1:04-CV-10078-NG

Hon. Nancy Gertner

MARTIN WEBER, On Behalf of Himself and All Others)
 Similarly Situated,)

Plaintiff,)

v.)

BIOPURE CORPORATION, THOMAS A. MOORE,)
 CARL W. RAUSCH and RONALD F. RICHARDS,)

Defendants.)

Civil Docket for Case No.:
 1:04-CV-10090-NG

Hon. Nancy Gertner

BRUCE HAIMS, Individually and On Behalf of)
 All Others Similarly Situated,)

Plaintiff,)

v.)

BIOPURE CORPORATION, THOMAS A. MOORE,)
 CARL W. RAUSCH and RONALD F. RICHARDS,)

Defendants.)

Civil Docket for Case No.:
 1:04-CV-10144-NG

Hon. Nancy Gertner

X

MODEL PARTNERS LIMITED, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

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Civil Docket for Case No.:
1:04-CV-10155-NG

Hon. Nancy Gertner

JUNE E. PATENAUDE, Individually and On Behalf of
All Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

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Civil Docket for Case No.:
1:04-CV-10179-NG

Hon. Nancy Gertner

W. KENNETH JOHNSON, On Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

NANCY L. PINCKNEY and GERTRUDE PINCKNEY,
Individually and On Behalf of All Others Similarly
Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE and
CARL W. RAUSCH,

Defendants.

GREGORY KRUSZKA, On Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS A. MOORE,
CARL W. RAUSCH and RONALD F. RICHARDS,

Defendants.

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Civil Docket for Case No.:

1:04-CV-10190-NG

Hon. Nancy Gertner

Civil Docket for Case No.:

1:04-CV-10189-NG

Hon. Nancy Gertner

Civil Docket for Case No.:

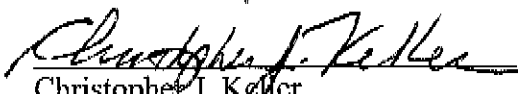
1:04-CV-10202-NG

Hon. Nancy Gertner

CHRISTOPHER KELLER hereby declares as follows:

1. I am an associate with the law firm of Goodkind Labaton Rudoff & Sucharow LLP, counsel for the Bhaskar Group ("Movant").
2. I respectfully submit this declaration in support of Movant's motion for consolidation of the related actions, appointment of Movant as Lead Plaintiff and approval of the selection of the firm of Goodkind Labaton Rudoff & Sucharow LLP as Lead Counsel.
3. Annexed hereto as Exhibit A is a true and correct copy of the Certification of Michael Lane, Certification of William Bhaskar, and Certification of Kenneth Isherwood.
4. Annexed hereto as Exhibit B is a true and correct copy of the December 30, 2003 notice announcing the filing of a class action against Biopure Corporation.
5. Annexed hereto as Exhibit C is a true and correct copy of the firm resume of Goodkind Labaton Rudoff & Sucharow LLP.

I declare, under penalty of perjury, this 1st of March, 2004.


Christopher J. Keller